

1 Jonathan C. Capp, (CA SBN 177585
2 13891 Bassmore Drive
3 San Diego, CA 92129
4 Tel. 760 231 6498
Fax. 858 435 2510
Email: jclex@gmail.com
5 Attorneys for Plaintiffs

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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

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11 CARLOS ALBERTO RODRIGUES
12 DE FREITAS as the Administrator of
the Estate of Isabel Auler (deceased),
13 CARLOS ALBERTO RODRIGUES
14 DE FREITAS an individual.

15 .

16 Case No.: 2: 18-cv-01522 -JAD-
17 BNW

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19 STIPULATION AND [PROPOSED]
20 ORDER ALLOWING PLAINTIFF TO
21 FILE THIRD AMENDED COMPLAINT
22 FOR DAMAGES

23 Plaintiffs,

24 VS.

25 THE HERTZ CORPORATION, a
26 Delaware corporation, ROBERT
CHARLES STEVENS, an individual,
27 and DOES 1- 10 inclusive

28 Defendants,

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1 WHEREAS Plaintiffs seeks to file their Third Amended Complaint for
2 Damages, which only adds sixth and seventh causes of action for Wrongful Death
3 (NRS 41.085) based upon the death of former Plaintiff Isabel Auler.

4 WHEREAS in lieu of Plaintiffs filing a motion to make a motion per, inter
5 alia, FRCP 15 the parties have agreed to permit Plaintiffs to file a Third Amended
6 Complaint.

7 WHEREAS a copy of Plaintiffs proposed Third Amended Complaint for
8 Damages is attached hereto as Exhibit "A."

9 IT IS HEREBY STIPULATED, by and between Plaintiffs and Defendant
10 HERTZ CORPORATION, by and thru their counsel that,

11 1. Plaintiffs should be granted leave to amend to file their Third Amended
12 Complaint for Damages, a copy of which is attached hereto as Exhibit "A."
13 2. Defendant's responsive pleading shall be due thirty (14) days after the
14 Second Amended Complaint for Damages is filed.

15 DATED: October 5, 2021.

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/s/ Jonathan C. Capp
JONATHAN C. CAPP ESQ.
LAW OFFICES OF JONATHAN C. CAPP
Attorney for Plaintiffs

Kevin Lazar

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/s/ KEVIN LAZAR ESQ.
= FORD WALKER, HAGGERTY & BEHAR
Attorney for Defendant HERTZ CORPORATION

Order
IT IS ORDERED that ECF
No. 116 is GRANTED. IT IS
FURTHER ORDERED that the
Clerk of Court shall detach ECF
No. 116-1 and separately file it
on the docket.

IT IS SO ORDERED

DATED: 8:46 am, October 20, 2021



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

James E. Murphy

/s/ JAMES E. MURPHY ESQ.
LEWIS BRISBOIS BISGAARD & SMITH LLP

Attorney for Defendant HERTZ CORPORATION